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4 Attorneys for Debtor

5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA

7 IN RE: CASE No. 10-11533

8 NAVJOT, LLC CHAPTER 11

9 DEBTOR. _____/

MOTION FOR ORDER AUTHORIZING USE
OF CASH COLLATERAL, DECLARATION
OF SURINDER SROA, MEMORANDUM OF
POINTS AND AUTHORITIES

(854-866 Fourth St., San Rafael)

Date: May 21, 2010

Time: 9:00 a.m.

Place: 99 South E St.
Santa Rosa, CA

14 TO: HONORABLE ALAN JAROSLOVSKY, UNITED STATES BANKRUPTCY JUDGE:

15 NAVJOT, LLC, Debtor herein, by and through counsel, hereby

16 moves the above entitled Court for an Order Authorizing Use of Cash

17 Collateral consistent with the Budget attached hereto as Exhibit A.

18 Said Motion is made on the grounds that the creditor is secured

19 by the rents from the premises located at 854-866 Fourth St., San

20 Rafael, CA but is adequately protected with the use of said rents by

21 the value of the real property and rents due in subsequent months.

22 Said Motion is made and based on the within Motion, the

23 Declaration of Surinder Sroa, and the Memorandum of Points and

24 Authorities appended hereto.

25 Dated: 5/19/10

DAVID N. CHANDLER, p.c.

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By: /s/ David N. Chandler

DAVID N. CHANDLER,
Attorney for Debtor

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1 at San Rafael, California.

2 /s/ Surinder Sroa
3 SURINDER SROA

4 MEMORANDUM OF POINTS AND AUTHORITIES

5 Navjot, LLC, Debtor herein, submit the following authorities
6 in support of its Motion for Order Authorizing Use of Cash
7 Collateral:

8 1. The within case was filed on April 27, 2010 pursuant to
9 Chapter 11 of the Code.

10 2. The real property located at 854-866 Fourth St., San
11 Rafael, CA is property of the within estate and encumbered by a
12 first priority Deed of Trust in favor of JP Morgan Chase.

13 3. Said property produces rent as shown in Exhibit A.

14 4. Certain expenses must be paid each month to maintain the
15 respective properties consistent with the obligations of the owner
16 pursuant to the applicable lease or rental agreement. The expenses
17 are set forth in the Budget attached hereto as Exhibit A.

18 5. The continuing rents are cash collateral of the said
19 secured creditor(s). In order to continue to produce rents,
20 certain expenses of the property are required to be paid.

21 6. The Debtor may not use cash collateral unless (a) the
22 entity having an interest consents, or (b) the court, after notice
23 and hearing authorizes such use. Section 363(c)(2).

24 7. A hearing on a cash collateral motion shall be scheduled
25 in accordance with the needs of the Debtor. Section 363(c)(3).

26 8. Debtor requires the use of cash collateral to pay
27 expenses as set forth in the Budget attached hereto as Exhibit A.

28 9. It is respectfully submitted that the Debtor be

1 authorized to utilize cash collateral rents pursuant to the said
2 budget and to pay such expenses as budgeted therefore as same are
3 incurred.

4 Dated: 5/19/10

DAVID N. CHANDLER, p.c.

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6 By: /s/ David N. Chandler
7 DAVID N. CHANDLER,
8 Attorney for Debtor
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Income Property Operating Statement

Entity Name:	Navjot LLC
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Property Address:	854-866 4th St
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<p>1. <i>What is the purpose of the study?</i></p> <p>2. <i>What are the research questions or hypotheses?</i></p> <p>3. <i>What is the study design?</i></p> <p>4. <i>What are the study population and sample?</i></p> <p>5. <i>What are the data collection methods?</i></p> <p>6. <i>What are the data analysis methods?</i></p> <p>7. <i>What are the results?</i></p> <p>8. <i>What are the conclusions?</i></p> <p>9. <i>What are the limitations?</i></p> <p>10. <i>What are the implications?</i></p>	<p>1. <i>What is the purpose of the study?</i></p> <p>2. <i>What are the research questions or hypotheses?</i></p> <p>3. <i>What is the study design?</i></p> <p>4. <i>What are the study population and sample?</i></p> <p>5. <i>What are the data collection methods?</i></p> <p>6. <i>What are the data analysis methods?</i></p> <p>7. <i>What are the results?</i></p> <p>8. <i>What are the conclusions?</i></p> <p>9. <i>What are the limitations?</i></p> <p>10. <i>What are the implications?</i></p>
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Date: _____

Date: _____